

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re	§ Chapter 7
Mountain Express Oil Company, et al.,	§ Case No. 23-90147 (EVR)
Debtors.¹	§ Jointly Administered
	§
	§

**FIFTH MONTHLY EXPENSE STATEMENT OF GREENBERG TRAURIG, LLP FOR
REIMBURSEMENT OF EXPENSES INCURRED AS SPECIAL LITIGATION
COUNSEL TO JANET NORTHRUP, SOLELY IN HER CAPACITY AS CHAPTER 7
TRUSTEE OF THE ESTATES OF MOUNTAIN EXPRESS, ET AL.**

Name of Applicant:	Greenberg Traurig, LLP, as Special Litigation Counsel to Janet Northrup, solely in her capacity as Chapter 7 Trustee of the Estates of Mountain Express, et al.
Date of Retention Order:	January 3, 2024 [Dkt. No. 1832]
Period for which Expenses are Incurred or Submitted:	March 1, 2025 through and including March 31, 2025
Interim Fees Incurred:	N/A ²
Interim Payment of Fees Requested (80%):	N/A
Interim Expenses Incurred:	\$22,491.61
Total Expenses Due:	\$22,491.61

IN ACCORDANCE WITH THE *ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS AND TRUSTEE* [Dkt. No. 1607], EACH PARTY IN INTEREST RECEIVING NOTICE OF THIS EXPENSE STATEMENT WILL HAVE UNTIL 5:00 P.M. (PREVAILING CENTRAL TIME), TEN (10) DAYS AFTER SERVICE OF THIS EXPENSE STATEMENT TO OBJECT TO THE REQUESTED EXPENSES. UPON THE EXPIRATION OF SUCH TEN (10) DAY PERIOD, THE TRUSTEE IS AUTHORIZED TO PAY THE PROFESSIONAL AN AMOUNT OF 100% OF THE EXPENSES REQUESTED IN THE EXPENSE STATEMENT.

¹ A complete list of each of the Debtors in these chapter 7 cases may be obtained on the Court's website at www.ecf.txsbs.uscourts.gov.

² Pursuant to section 328(a) of the Bankruptcy Code, the Trustee will compensate Greenberg Traurig for professional services rendered in connection with these chapter 7 cases on a contingency fee basis in accordance with the *Order Authorizing Employment of Greenberg Traurig, LLP as Special Litigation Counsel* [Dkt. No. 1832]. Therefore, Greenberg Traurig will seek compensation of fees for professional services at a later date as agreed by the Chapter 7 Trustee.

Greenberg Traurig, LLP (“Greenberg Traurig”), Special Litigation Counsel for the Chapter 7 Trustee, Janet Northrup (the “Trustee”), submits this Fifth Expense Statement (the “Expense Statement”) for the period from March 1, 2025 through and including March 31, 2025 (the “Expense Application Period”) pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Dkt No. 1607] (the “Interim Compensation Order”).

Greenberg Traurig requests reimbursement of out-of-pocket expenses incurred in the total amount of \$22,491.61 for the Expense Application Period. A summary of these expenses is attached hereto as Exhibit 1. Greenberg Traurig’s expense invoice for the Expense Application Period is attached hereto as Exhibit 2.³

Notice of the Expense Statement has been provided to the Trustee, the United States Trustee, the Debtor, all parties entitled to receive notice via the Court’s CM/ECF system, and all parties listed on the Service List referenced in the accompanying certificate of service. In light of the nature of the relief requested herein, Greenberg Traurig submits that no further notice is required. Pursuant to the Interim Compensation Order, the parties receiving notice of this Expense Statement have until the tenth (10th) day following the filing of this Expense Statement to object to the requested Expenses. Pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objection to the Expense Statement is received, the Trustee is authorized and directed to pay to Greenberg Traurig the amount of \$22,491.61 which is 100% of the Expenses incurred by Greenberg Traurig during the Expense Application Period.

³ As detailed in Exhibit 2, some expenses predate the Expense Application Period because they were posted to Greenberg Traurig’s accounting system by vendors during the Expense Application Period. This Expense Statement includes charges Greenberg Traurig has recorded as of the filing date of this Expense Statement.

WHEREFORE, Greenberg Traurig respectfully requests payment and reimbursement in the total amount of \$22,491.61.

Dated: April 9, 2025
Houston, Texas

GREENBERG TRAURIG, LLP

/s/ Emily D. Nasir

Shari L. Heyen (Texas Bar No. 09564750)
Shari.Heyen@gtlaw.com
Emily D. Nasir (Texas Bar No. 24118477)
Emily.nasir@gtlaw.com
1000 Louisiana St., Suite 1700
Houston, Texas 77002
Telephone: (713) 374-3564
Facsimile: (713) 374-3505

– and –

John D. Elrod (admitted *pro hac vice*)
ElrodJ@gtlaw.com
Terminus 200, Suite 2500
3333 Piedmont Road, NE
Atlanta, Georgia 30305
Telephone: (678) 553-2259
Facsimile: (678) 553-2269

**SPECIAL LITIGATION COUNSEL TO
JANET NORTHRUP, SOLELY IN HER
CAPACITY AS CHAPTER 7 TRUSTEE
OF THE ESTATES OF MOUNTAIN
EXPRESS, ET AL.**

CERTIFICATE OF SERVICE

On April 9, 2025, I hereby certify that a true and correct copy of the foregoing has been served on parties entitled to receive CM/ECF notice via the Court's CM/ECF system in the above-referenced case and on the parties listed on the attached Master Service List via first-class, U.S. Mail, postage-prepaid to the extent not sent via CM/ECF.

/s/ Emily D. Nasir

Emily D. Nasir

Exhibit 1**Summary of Out-of-Pocket Expenses**

Expenses	Cost
Meals	\$29.69
Court Fees	\$405.00
Copies and Outside Printing	\$130.50
Couriers	-\$14.75 (credit)
Delivery Services/Couriers	\$51.72
Local Travel	\$240.00
Other (Ediscovery)	\$18,945.04
Other (Proof of Service)	\$1,148.00
Out-of-town Travel and Lodging	\$1,509.31
Online Research	\$47.10
TOTAL	\$22,491.61

Exhibit 2

Invoice for the Expense Application Period

Invoice No.: 1000975343
 Re: Mountain Express Bankruptcy - Expenses
 Matter No.: 221400.010200

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Description of Expenses Billed:**Business Meals**

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/12/25	VENDOR: Elrod, John D. INVOICE#: 91144 DATE: 3/3/2025 Hotel; 03/12/2025 3/12 MEX Hunter Depo, Memphis, TN; Merchant: The Memphian; Attendees: John Elrod	\$ 29.69
	Business Meals Subtotal:	\$ 29.69

Filing Fees

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/17/25	VENDOR: Hall, Heather INVOICE#: 96612 DATE: 3/28/2025 Filing Fee; 03/17/2025 Wadud - Filing Fees; Merchant: Georgia Northern District Court	\$ 405.00
	Filing Fees Subtotal:	\$ 405.00

Lexis Information and Research

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/10/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3095695353 DATE: 3/31/2025 Lexis Charges: Period Mar 1 - Mar 31 2025	\$ 15.70
03/12/25	VENDOR: LexisNexis (1842) - ACH INVOICE#: 3095695353 DATE: 3/31/2025 Lexis Charges: Period Mar 1 - Mar 31 2025	\$ 31.40
	Lexis Information and Research Subtotal:	\$ 47.10

Local Travel

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/11/25	VENDOR: Elrod, John D. INVOICE#: 91144 DATE: 3/3/2025 Car Service/Taxi; 03/11/2025 3/12 MEX Hunter Depo, Memphis, TN; Merchant: Car Service by Jerren Nixon	\$ 120.00
03/12/25	VENDOR: Elrod, John D. INVOICE#: 91144 DATE: 3/3/2025 Car Service/Taxi; 03/12/2025 3/12 MEX Hunter Depo, Memphis, TN; Merchant: Car Service by Jerren Nixon	\$ 120.00
	Local Travel Subtotal:	\$ 240.00

Messenger/Courier Services

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/20/25	VENDOR: FedEx - ACH INVOICE#: 881422909 DATE: 3/31/2025 Fedex Service Req'd by Rosenwasser, Steven J. on 03/20/25 from GT-Atlanta	\$ 25.86

Invoice No.: 1000975343 Page 3
 Re: Mountain Express Bankruptcy - Expenses
 Matter No.: 221400.010200

03/20/25	VENDOR: FedEx - ACH INVOICE#: 881422909 DATE: 3/31/2025 Fedex Service Req'd by Rosenwasser, Steven J. on 03/20/25 from GT-Atlanta	\$ 25.86
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Messenger/Courier Services Subtotal:	\$ 51.72
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Off-site Printing and Copying Charges

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/24/25	VENDOR: PROOF- ACH INVOICE#: 767916 DATE: 3/24/2025 Defendant:TURJO WA, et al. Plaintiff: JANET NORTHRUP, as Chapter 7 Trustee for the Estate of Mountain Express Company and affiliated debtors. Printing Fee and Standard Serve	\$ 130.50

Off-site Printing and Copying Charges Subtotal:	\$ 130.50
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Professional & Legal

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/01/25	VENDOR: CS Disco Inc (4444) ACH INVOICE#: 590012 DATE: 3/1/2025 Professional Services Rendered	\$ 18,945.04

Professional & Legal Subtotal:	\$ 18,945.04
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Service Company Charges

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/23/25	VENDOR: PROOF- ACH INVOICE#: 767051 DATE: 3/23/2025 Servee: Habiba Wadud	\$ 130.50
03/24/25	VENDOR: PROOF- ACH INVOICE#: 767416 DATE: 3/24/2025 Servee:John Scott	\$ 130.50
03/26/25	VENDOR: PROOF- ACH INVOICE#: 769597 DATE: 3/26/2025 Job# 908890 Standard Serve- Servee: Abdel Abdul a/k/a Abdel Khalil	\$ 120.00
03/27/25	VENDOR: PROOF- ACH INVOICE#: 771032 DATE: 3/27/2025 Servee: KF Oil & Gas Corporation Defendant: KF Oil & Gas Corporation, an Ohio corporation, and ABDEL ABDUL Plaintiff	\$ 240.00
03/31/25	VENDOR: PROOF- ACH INVOICE#: 772856 DATE: 3/31/2025 Job 916052, Servee: 4 Court Holdings LLC, Defendant: TURJO WADUD, et al., Plaintiff	\$ 120.50
03/31/25	VENDOR: PROOF- ACH INVOICE#: 772896 DATE: 3/31/2025 Job 916055, Servee: 4 Court Imaging LLC, Defendant: TURJO WADUD, et al., Plaintiff	\$ 135.50
03/31/25	VENDOR: PROOF- ACH INVOICE#: 772899 DATE: 3/31/2025 Job 916040, Servee: Defendant: TURJO WADUD, et al.,	\$ 135.50
03/31/25	VENDOR: PROOF- ACH INVOICE#: 772900 DATE: 3/31/2025 Job 916059, Servee: 4Court Leasing, LLC, Defendant: TURJO WADUD,	\$ 135.50

Service Company Charges Subtotal:	\$ 1,148.00
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Invoice No.: 1000975343
 Re: Mountain Express Bankruptcy - Expenses
 Matter No.: 221400.010200

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Travel and Lodging Out of Town

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
03/11/25	VENDOR: Elrod, John D. INVOICE#: 91144 DATE: 3/3/2025 Car Service/Taxi; 03/11/2025 3/12 MEX Hunter Depo, Memphis, TN; Merchant: Uber	\$ 15.45
03/11/25	VENDOR: Elrod, John D. INVOICE#: 91144 DATE: 3/3/2025 Car Service/Taxi; 03/11/2025 3/12 MEX Hunter Depo, Memphis, TN; Merchant: Uber	\$ 43.76
03/12/25	VENDOR: Elrod, John D. INVOICE#: 91144 DATE: 3/3/2025 Hotel; 03/12/2025 3/12 MEX Hunter Depo, Memphis, TN; Merchant: The Memphian	\$ 348.48
03/12/25	VENDOR: Elrod, John D. INVOICE#: 91144 DATE: 3/3/2025 Airfare; 03/12/2025 3/12 MEX Hunter Depo, Memphis, TN; Merchant: Delta Air Lines	\$ 1,066.96
03/12/25	VENDOR: Elrod, John D. INVOICE#: 91144 DATE: 3/3/2025 Car Service/Taxi; 03/12/2025 3/12 MEX Hunter Depo, Memphis, TN; Merchant: Uber	\$ 34.66
Travel and Lodging Out of Town Subtotal:		\$ 1,509.31

UPS Credits

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
02/13/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00030125504 DATE: 3/1/2025 / GSR Next Day Air Commercial from Greenberg Traurig Llp	\$ -6.64
02/13/25	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00030125504 DATE: 3/1/2025 / GSR Next Day Air Commercial from Greenberg Traurig Llp	\$ -8.11
UPS Credits Subtotal:		\$ -14.75
Total Expenses:		\$ 22,491.61

MASTER SERVICE LIST
Mountain Express Oil Company
Case No. 23-90147

All service made by US first class mail, postage prepaid unless otherwise indicated

Debtor

Mountain Express Oil Company
Turjo Wadud
c/o Johnnie J. Patterson, II
Walker & Patterson, PC
4815 Dacoma Street
Houston, TX 77092
Via First Class U.S. Mail, postage prepaid

Debtor's Representative

Neil Lansing, Designated Representative
2295 Haynes Trail
Johns Creek, GA 30022
Via First Class U.S. Mail, postage prepaid

Chapter 7 Trustee

Janet S. Northrup
Chapter 7 Trustee
1201 Louisiana Street
28th Floor
Houston, TX 77002
Via ECF jsnorthrup@hwa.com

Office of the U.S. Trustee

Hector Duran Jr.
Office of the United States Trustee
for the Southern District of Texas
515 Rusk Street, Suite 3516
Houston, TX 77002
Via ECF Hector.Duran.Jr.@usdoj.gov

U.S. Attorney's Office

United States Attorney's Office
for the Southern District of Texas
Wells Fargo Plaza
1000 Louisiana Street, Suite 2300
Houston, TX 77002

20 Largest Creditors

Sunoco
3801 West Chester Pike
Newton Square, PA 19073
Via First Class U.S. Mail, postage prepaid

Valero
One Valero Way
San Antonio, TX 78249
Via First Class U.S. Mail, postage prepaid

COCA-COLA Bottling CO
PO Box 105637
Atlanta, GA 30348-5637
Via First Class U.S. Mail, postage prepaid

Marathon
539 S. Main Street
Findlay, OH 45840
Via First Class U.S. Mail, postage prepaid

Cross Oil Refining & Marketing
484 East 6th Street
Smackover, AR 71762
Via First Class U.S. Mail, postage prepaid

KeyBank Real Estate Capital
PO Box 145404
Cincinnati, OH 45250
Via First Class U.S. Mail, postage prepaid

Exxon Mobil
PO Box 74007276
Chicago, IL 60674-7276
Via First Class U.S. Mail, postage prepaid

VM Petro Inc.
2188 Kirby Lane
Syosset, NY 11791
Via First Class U.S. Mail, postage prepaid

Pepsi Beverages
75 Remittance Drive, Suite 1884
Chicago, IL 60675
Via First Class U.S. Mail, postage prepaid

Flying J-Saratoga-Pilot
5508 Lonas Drive
Knoxville, TN 37909
Via First Class U.S. Mail, postage prepaid

Shell
910 Louisiana Street
Houston, TX 77002
Via First Class U.S. Mail, postage prepaid

Sinclair Distributor Services
PO Box 30825
Salt Lake City, UT 84130
Via First Class U.S. Mail, postage prepaid

Federated Insurance
PO Box 486
Owatonna, MN 55060
Via First Class U.S. Mail, postage prepaid

JF Acquisition LLC
PO Box 531829
Atlanta, GA 30353-1829
Via First Class U.S. Mail, postage prepaid

DAS Distributors TC
724 Lawn Road
Palmyra, PA 17078
Via First Class U.S. Mail, postage prepaid

Imperial Trading Company
701 Edwards Avenue
Elmwood, LA 70123
Via First Class U.S. Mail, postage prepaid

ARG 1 CBHGNJ001, LLC et al.
PO Box 71532
Cincinnati, OH 45271-5352
Via First Class U.S. Mail, postage prepaid

Entergy
PO Box 8108
Baton Rouge, LA 70891
Via First Class U.S. Mail, postage prepaid

Anthem Blue Cross Blue Shield
PO Box 645438
Cincinnati, OH 45264-5438
Via First Class U.S. Mail, postage prepaid

Southern Eagle Sales & Service LP
5300 Blair Drive
Metairie, LA 70003
Via First Class U.S. Mail, postage prepaid

Any party that has requested notice pursuant to Bankruptcy Rule 2002 as of the time of service via ECF